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Via Email (CrottyNYSDCchambers@nysd.uscourts.gov)

Hon. Paul A. Crotty, United States District Judge

Daniel Patrick Moynihan

United States Courthouse

500 Pearl Street

New York, NY 10007-1312

Re: *Kinuthia. v. Vallat Inc., et al.*

09 CV 7102 (PAC)

Application GRANTED, and a conference will go  
Forward on 9/15/10 at 3:00pm in Courtroom 205.

SO ORDERED:

*Paul A. Crotty*  
HON. PAULA A. CROTTY  
UNITED STATES DISTRICT JUDGE

01 JUL 2010

Dear Judge Crotty:

This office represents the Defendants. I write to provide the court with an update on the status of this matter. The parties are currently engaged in discovery and have exchanged some documents. They have agreed to the Confidentiality Stipulation that is attached to this email for the Court to So Order. The Stipulation will facilitate the production of the remainder of the documents. Individuals to be deposed have been identified and deposition dates are being discussed.

The parties have discovered that they will need additional time to complete discovery. The parties have identified at least twelve individuals, including the eight collective action members that they need to depose. Currently, discovery is scheduled to close on July 30. With summer vacation schedules, it appears impossible to complete all depositions prior to the current cut-off date and the parties request until September 17, 2010 to complete discovery.

Respectfully submitted,  
CLIFTON BUDD & DEMARIA, LLP

By:

*Daniel W. Morris*

Daniel W. Morris

cc: Matthew Kadushun (via email)